

UNITED STATES DISTRICT COURT

for the
Eastern District of Wisconsin

In the Matter of the Search of:

Sixteen Electronic Devices including fourteen cellular
 telephones, one Apple Watch, and one Apple iPad currently
 in the custody of the West Allis Police Department further
 described in Attachment A

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Case No.

23-1817M(NJ)

SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search of the following person
 or property located in the Eastern District of Wisconsin:

See Attachment A

I find that the affidavit(s) or any recorded testimony, establish probable cause to search and seize the person or property described
 above and that such search will reveal:

See Attachment B

YOU ARE COMMANDED to execute this warrant ON OR BEFORE 10/30/2023 (*not to exceed 14 days*)
☐ in the daytime between 6:00 a.m. and 10:00 p.m. ☒ at any time in the day or night because good cause has been established.

Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the
 person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the
 property was taken.

The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory as required
 by law and promptly return this warrant and inventory to Nancy Joseph.

(United States Magistrate Judge)

☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C.
 § 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notice to the person who, or whose
 property, will be searched or seized (*check the appropriate box*)

☐ for _____ days (not to exceed 30) ☐ until, the facts justifying, the later specific date of _____.

Date and time issued: 10/16/2023 @ 1:43p.m.



Judge's signature

City and State: Milwaukee, Wisconsin

Nancy Joseph

U.S. Magistrate Judge

Return

Case No:	Date and time warrant executed:	Copy of warrant and inventory left with:
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Inventory made in the presence of:

Inventory of the property taken and/or name of any person(s) seized:

Certification

I declare under penalty of perjury that this inventory is correct and was returned along with the original warrant to the undersigned judge.

Date: _____

*Executing officer's signature*_____
Printed name and title

Subscribed, sworn to, and returned before me this date:

Date: _____

United States Magistrate Judge

ATTACHMENT A

The property to be searched is described as follows:

- a)** Black Motorola Android touch screen cell phone with no case. (“Device A”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-1).
- b)** Gold Apple iPhone touch screen cell phone with cracked screen and Joe Biden sticker (I did that) on back. (“Device B”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-2). Geovany ALVAREZ possessed Devices A and B when he was arrested at 1 Lyon Ct. Bloomington, IL.
- c)** Gold Apple iPhone touch screen cell phone with clear and gold case. (“Device C”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-3). Henry GOMEZ-GOMEZ possessed Device C when he was arrested at 1 Lyon Ct. Bloomington, IL.
- d)** Gold and silver Apple iPhone touch screen cell phone. (“Device D”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-4).
- e)** Black Nokia Android touch screen cell phone with no case. (“Device E”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-5).
- f)** Black Samsung Android touch screen cell phone with no case. (“Device F”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-6).
- g)** Black Motorola Android touch screen cell phone with no case. (“Device G”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD

Inventory # 23-004615-7). Carlos GUZMAN-TOLEDO possessed Devices D, E, F, and G when he was arrested at 1 Lyon Ct. Bloomington, IL.

- h)** Black Samsung Android touch screen cell phone with blue case. (“Device H”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-8).
- i)** Purple Apple iPhone touch screen cell phone with black case. (“Device I”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-9).
- j)** Grey Apple watch touch screen with silver band. (“Device J”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-10). Anthony GOMEZ-GOMEZ possessed Devices H, I, and J when he was arrested at 1 Lyon Ct. Bloomington, IL.
- k)** Black Samsung Android touch screen with no case. (“Device K”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-11).
- l)** Gold Apple iPhone touch screen cell phone with no case. (“Device L”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-12).
- m)** Grey Nokia Android touch screen cell phone with green/black case. (“Device M”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-13). Investigators located Devices K, L, and M during the execution of State of Illinois search warrant at 1 Lyon Ct. Bloomington, IL Room # 330 inside a designer Coach Bag.
- n)** Black Samsung fold touch screen cell phone with no case. (“Device N”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-14).

- o) Black Apple iPhone touch screen with cracked back and no case. (“Device O”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-15).

- p) Apple iPad with black case. (“Device P”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-16). Investigators located Devices N, O, and P during the execution of State of Illinois search warrant at 1 Lyon Ct. Bloomington, IL, Room # 330.

(collectively “**ELECTRONIC DEVICES**”). This warrant authorizes the forensic examination of the **ELECTRONIC DEVICES** for the purpose of identifying the electronically stored information described in Attachment B.

ATTACHMENT B

1. All records on the **ELECTRONIC DEVICES** described in Attachment A that constitute evidence or instrumentalities of violations of Title 18, United States Code, Sections 511(a) (altering or removing motor vehicle identification numbers); 2312 (interstate transportation of stolen vehicles); 2321 (Buying or selling motor vehicles with altered vehicle identification numbers); and 371 (conspiracy to commit those offenses) since January 1, 2022 through September 23, 2023 including, but not limited to:

- a. Records related to the sale of stolen vehicles including advertisements and communications with customers;
- b. Records reflecting communication between co-conspirators including communications relating to the logistics of the conspiracy;
- c. Records reflecting communication about the procurement of stolen vehicles to sell;
- d. Contact lists;
- e. Any information regarding schedules or travel;
- f. All bank records including, but not limited to, checks, credit card bills, account information, and other financial records;
- g. Photographs and/or videos depicting theft/fraud, money laundering, or other related activity, including co-conspirators and/or others engaged in such activity; and
- h. Records of Internet Protocol (IP) addresses used; records of internet activity, including firewall logs, caches, browser history and cookies,

“bookmarked” or “favorite” web pages, search terms that the user entered into any internet search engine, and records of user typed web addresses;

2. Evidence of user attribution showing who used or owned the electronic devices described in Attachment A at the time the things described in this warrant were created, edited, or deleted, such as logs, phonebooks, saved usernames and passwords, documents, and browsing history;

As used above, the terms “records” and “information” include all of the foregoing items of evidence in whatever form and by whatever means they may have been created or stored, including any form of computer or electronic storage (such as flash memory or other media that can store data) and any photographic form.

UNITED STATES DISTRICT COURT

for the
Eastern District of Wisconsin

In the Matter of the Search of:

Sixteen Electronic Devices including fourteen cellular
telephones, one Apple Watch, and one Apple iPad currently
in the custody of the West Allis Police Department further
described in Attachment A

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) Case No. 23-1817M(NJ)
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APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property:

See Attachment A

located in the Eastern District of Wisconsin, there is now concealed:

See Attachment B

The basis for the search under Fed. R. Crim P. 41(c) is:

- ☒ evidence of a crime;
☐ contraband, fruits of crime, or other items illegally possessed;
☒ property designed for use, intended for use, or used in committing a crime;
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to violations of: 18 U.S.C. §§ 511(a), 2312, 2321, 371

The application is based on these facts: See attached affidavit.

- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



JOHN M CERF
2023.10.13 10:01:32
-05'00'

Applicant's signature

John Cerf, Special Agent, HSI
Printed Name and Title

Sworn to before me telephonically:

Date: 10/16/2023


Judge's signature

City and State: Milwaukee, Wisconsin

Case 2:23-nj-01817-NJ

Filed 10/16/23

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Document 1

U.S. Magistrate Judge

Printed Name and Title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION UNDER
RULE 41 FOR A WARRANT TO SEARCH AND SEIZE**

I, Special Agent John Cerf, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a search warrant authorizing the examination of property—fourteen cellular telephones, one Apple Watch, and one Apple iPad (collectively “**ELECTRONIC DEVICES**”) further described in Attachment A—which are currently in law enforcement possession, and the extraction from that property of electronically stored information described in Attachment B.

I am a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations (HSI), assigned to the Resident Agent in Charge (RAC) Milwaukee, Wisconsin. I have been employed with HSI as a Special Agent for approximately 15 years. I have been a sworn federal law enforcement officer specifically investigating crimes involving narcotics, firearms, fraud, smuggling, terrorism, and immigration since 2008. Throughout my law enforcement career, I have received training in general law enforcement and in specialized areas including fraud and smuggling. I am an investigator or law enforcement officer of the United States within the meaning of Title 8, United States Code, Section 1357(a)(5), that is, an officer of the United States who is empowered to conduct investigations of, and to make arrests for, certain offenses enumerated in Titles 8, 18, 19, 21, and 31 of the United States Code, and other related offenses. Since becoming employed as a federal agent, I have completed the Criminal Investigator Training Program at the Federal Law Enforcement Training Center in Brunswick, Georgia.

2. As part of my duties as an HSI Special Agent, I have experience conducting criminal investigations involving narcotics, firearms, financial fraud, and smuggling and have participated in the execution of search warrants in such investigations.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter. Throughout this affidavit, reference will be made to case agents or investigators. Case agents or investigators are those federal, state, and local law enforcement officers who have directly participated in this investigation, and with whom I have had contact regarding this investigation.

4. For the reasons discussed herein, there is probable cause to believe that the **ELECTRONIC DEVICES** contain evidence and instrumentalities of violations of Title 18, United States Code, Sections 511(a) (altering or removing motor vehicle identification numbers); 2312 (interstate transportation of stolen vehicles); 2321 (Buying or selling motor vehicles with altered vehicle identification numbers); and 371 (conspiracy to commit those offenses) that have been committed by Geovany ALVAREZ (DOB: 12/05/2001), Jesus ARRIAGA (DOB: 11/10/1986), Henry L. GOMEZ-GOMEZ (DOB: 07/02/1982), Carlos G. GUZMAN-TOLEDO (DOB: 05/11/1975) and Anthony W. GOMEZ-GOMEZ (DOB: 11/14/1998) among others.

IDENTIFICATION OF THE DEVICES TO BE EXAMINED

5. The property to be searched includes:

- a) Black Motorola Android touch screen cell phone with no case. (“Device A”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (West Allis Police Department (WAPD) Inventory # 23-004615-1).
- b) Gold Apple iPhone touch screen cell phone with cracked screen and Joe Biden sticker (I did that) on back. (“Device B”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-2). Geovany ALVAREZ possessed Devices A and B when he was arrested at 1 Lyon Ct. Bloomington, IL.
- c) Gold Apple iPhone touch screen cell phone with clear and gold case. (“Device C”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-3). Henry GOMEZ-GOMEZ possessed Device C when he was arrested at 1 Lyon Ct. Bloomington, IL.
- d) Gold and silver Apple iPhone touch screen cell phone. (“Device D”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-4).
- e) Black Nokia Android touch screen cell phone with no case. (“Device E”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-5).
- f) Black Samsung Android touch screen cell phone with no case. (“Device F”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-6).
- g) Black Motorola Android touch screen cell phone with no case. (“Device G”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-7). Carlos GUZMAN-TOLEDO possessed Devices D, E, F, and G when he was arrested at 1 Lyon Ct. Bloomington, IL.

- h)** Black Samsung Android touch screen cell phone with blue case. (“Device H”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-8).
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- j)** Grey Apple watch touch screen with silver band. (“Device J”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-10). Anthony GOMEZ-GOMEZ possessed Devices H, I, and J when he was arrested at 1 Lyon Ct. Bloomington, IL.
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- l)** Gold Apple iPhone touch screen cell phone with no case. (“Device L”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-12).
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o) Black Apple iPhone touch screen with cracked back and no case. (“Device O”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-15).

p) Apple iPad with black case. (“Device P”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-16). Investigators located Devices N, O, and P during the execution of State of Illinois search warrant at 1 Lyon Ct. Bloomington, IL, Room # 330.

PROBABLE CAUSE

10. The United States, including the United States Department of Homeland Security, HSI, and the WAPD are conducting a criminal investigation of Geovany ALVAREZ and others regarding violations of Title 18, United States Code, Sections 511(a) (altering or removing motor vehicle identification numbers); 2312 (interstate transportation of stolen vehicles); 2321 (buying or selling motor vehicles with altered vehicle identification numbers); and 371 (conspiracy to commit those offenses).

11. On June 30, 2023, West Allis Police Department was contacted regarding suspected stolen vehicles. Employees of Reo Motors in Milwaukee, Wisconsin believed there were two stolen vehicles at their business, which were being sold by Elite Auto Group at a different location (2048 S. 55th St. West Allis, Wisconsin). Investigators from the West Allis Police Department responded to Reo Motors, 2777 S. 27th St. in Milwaukee, Wisconsin. Investigators observed a black GMC Sierra Denali and a white GMC Sierra Denali parked in the back of the business. Employees of Reo Motors stated the vehicle identification numbers (VIN) on both vehicles were fraudulent and the correct VIN was discovered with the use of a diagnostic tool.

12. A victim, (E.E.C.), stated he observed a white 2021 GMC Sierra Denali posted for sale by Elite Auto Group on Facebook Marketplace¹. E.E.C drove to Elite Auto Group on June 29, 2023 and purchased the white GMC Sierra Denali. E.C.C paid \$31,000 cash for the vehicle. After the purchase, E.C.C drove the vehicle to Reo Motors for an inspection. A diagnostic tool was connected to the vehicle, which displayed the vehicle year as 2020 and VIN as 3GTU9FELXLG428736, which did not match the visible VIN on the white GMC Denali. The VIN visible on this vehicle is 3GTU9FETXMG388076. E.E.C was given paperwork for this sale, which listed the address of 2048 S. 55th St. West Allis, WI for “Elite Auto Group” and the salesman’s name as “Javier”. Attached to this receipt was a business card for “Guzman Zanchez” of Elite Auto Group at 2048 S. 55th St West Allis, WI, and phone 409-363-6713, which also had the same name and logo that is depicted on the door at 2044 S. 55th St. West Allis, WI. E.E.C stated that he did not consent to being sold a likely stolen vehicle for a loss of \$31,000.

13. A victim, (J.L.V.), stated on June 30, 2023, he observed a black 2021 GMC Sierra Denali posted for sale by Elite Auto Group on Facebook Marketplace. The vehicle was located at 2048 S. 55 St. West Allis, WI. J.L.V. had Facebook Messenger conversations with “Fernando Rivera” (Facebook account 100093623671652) and “Alejandro Gonzales” (Facebook account 100093439372506), about the vehicle. J.L.V. drove to the business on June 30th, 2023. J.L.V. gave an employee his identification card and took the black 2021 GMC Sierra Denali for a test drive. J.L.V drove the vehicle to Reo Motors for an inspection. A diagnostic tool was connected to the vehicle and the VIN, 3GTU9FEL5MG458275, did not match the visible VIN on the vehicle. The

¹ Facebook Marketplace is a section of Facebook, a social media application, that allows for the advertisement of merchandise and services. Facebook members can advertise and view advertisements. Facebook allows for communication between members to arrange for the sale/purchase of merchandise and services.

VIN visible on this vehicle is 3GTU9FEL8MG102435. An employee of Reo Motors ordered a CarFax report for the VIN displayed on the diagnostic tool, which indicated the VIN was reported stolen.

14. J.L.V observed several other newer trucks for sale inside the business 2048 S. 55 St. West Allis, WI. He was told by an Elite Auto Group employee that more vehicles would be coming on Monday, July 3, 2023.

15. Both the white GMC Sierra Denali and black GMA Sierra Denali were towed to the City of West Allis Police Department for further investigation. On July 3, 2023, further investigation was conducted into the recovered stolen vehicles. The White 2020 GMC Sierra 1500 Denali, VIN 3GTU9FELXLG428736, was reported stolen on June 1, 2023 and documented by the Houston Police Department, case 077925523. Upon scanning the key fob, the vehicle was identified as having LG428736 as the last eight digits in the VIN. GMC service staff additionally confirmed the vehicle as having VIN 3GTU9FELXLG428736 using their diagnostic computer. Upon removing the front drivers side wheel well, the following numbers were located on the engine block L87*TLG428736*. The Black GMC Black 2021 GMC Sierra Denali, VIN 3GTU9FEL5MG458275, was reported stolen on June 22, 2023 and documented by the Houston Police Department, case 088896223. Upon removing the front driver's side wheel well, the following numbers were located on the engine block L87*TMG458275*. Upon a search of the Black GMC Black 2021 GMC Sierra Denali VIN 3GTU9FEL5MG458275 the following evidence was located: wheel lock packaging that showed VIN#MG458275, State of Texas buyers tag receipt with date of sale 11/30/21, State Farm Insurance information for the 2021 GMC VIN 3GTU9FEL5MG458275.

16. On July 5, 2023, a State of Wisconsin search warrant was executed at 2044/2048 S. 55th Street West Allis, WI. No employees or vehicles were located, and the business appeared to

have been abruptly vacated. Various items related to vehicles were recovered. Further the following specific items were recovered:

- A luggage tag indicating Milwaukee DL 2970 MKE KIAH05 18Jun / DL 0635 ATL Bag Fee Paid 8006322233 listing to ALVAREZ/GEOVANYM # HNQHFO;
- Elite Auto Group business card for Guzman Zanchez, 409-363-6713, gusmanpereida549@gmail.com, 2048 S. 55th St. West Allis 53218;
- Bank envelopes, money bands, and plastic baggies labeled in large denominations.

17. On July 5, 2023, contact was made with a witness (O.C.), who on June 20, 2023, subleased 2044/2048 S. 55th St. West Allis, WI to a group of Hispanic males for \$3,500. O.C. met three males and was provided Mexico passport G28334007, which identified one of the males as Guzman PEREIDA SANCHEZ and an Elite Auto Group business card with phone 409-363-6713, and phone 409-344-6963. O.C. had taken a photo of the passport for leasing records.

18. Law enforcement databases had no record for Guzman PEREIDA SANCHEZ's identity or Mexico passport G28334007. Geovany Mendez ALVAREZ, with a date of birth 12/05/2001 and U.S. passport 646630005, was identified through law enforcement databases as a name match to the airline baggage tag recovered at Elite Auto Group. Photographs of Geovany ALVAREZ and Guzman PEREIDA SANCHEZ appeared to be the same person.

19. O.C. viewed the photograph of Geovany ALVAREZ and confirmed this was the person he believed to be Guzman PEREIDA SANCHEZ, who leased 2044/2048 S. 55th St. West Allis, WI on June 20, 2023.

20. On July 6, 2023, investigators learned of another victim, (“S.S.”), who purchased a red 2021 GMC Sierra Denali 1500, VIN 3GTU9FEL4MG162406, from Elite Auto Group. This vehicle was stolen from Houston, TX on June 12, 2023, and displayed a fraudulent VIN. S.S. advised that over \$30,000 cash was paid for this vehicle.

21. On July 7, 2023, investigators learned of another victim, (“J.S.”), who purchased a Chevrolet Silverado, VIN 3GCPYFED6LG417743, from Elite Auto Group. This vehicle was stolen from Dallas, TX on January 24, 2023, and displayed a fraudulent VIN and paperwork. J.S. paid \$35,000 for the vehicle, which came with Texas title. J.S. identified an employee named “Javi Santos” with phone 346-755-4026 and was given a business card for Guzman ZANCHEZ with phone 409-363-6713. On July 7, 2023, J.S. called 409-363-6713 and a Hispanic male answered but claimed not to speak English and hung up.

22. On July 7, 2023, a witness (“I.E.G”), viewed a photo array, which included a photograph of Geovany ALVAREZ. I.E.G. identified Geovany ALVAREZ as the person who sold E.E.C a vehicle on July 29, 2023 that was later determined to be stolen.

23. Video surveillance from General Mitchell International Airport regarding Delta Airlines flight 2970 from June 19th, 2023 shows Geovany ALVAREZ and an unidentified male exit the gate and proceed to a baggage carousel, where Geovany ALVAREZ and the unidentified male collect luggage. Geovany ALVAREZ and the unidentified male exit the airport building and wait for a ride. The unidentified male appeared to be a person photographed at Elite Auto Group by a victim. The photograph depicted the unidentified male wearing the same grey designer tennis shoes.

24. Delta Airlines responded to Grand Jury subpoenas and provided records for flight 2970 from June 18, 2023 and passenger information. The itinerary passenger records listed Geovany ALVAREZ and identified his travel companion as Jesus ARRIAGA. This was determined as they shared confirmation HNQHFO, had adjacent seats, and had sequential ticket numbers. Passenger information for Geovany ALVAREZ included a phone of 469-755-4568, and email spoolyboy@icloud.com.

25. An investigation in North Carolina involved the fraudulent sale of stolen motor vehicles during March 2023. During this investigation 10 stolen vehicles were recovered from victims. Platinum Zen Motors, an involved business, and a suspect were identified from security video. Grand Prairie (Texas) Police Detective Michael Randall reviewed the security video and identified the suspect as Carlos ALVAREZ, whom he had previously arrested and interviewed.

26. An investigation conducted by the Nebraska Motor Vehicle Fraud Unit identified 16 stolen vehicles sold between April 30, 2023 and May 8, 2023, for a total loss of \$503,500. This investigation also involved Mexico passport G28334007 for Guzman PEREIDA SANCHEZ. Proceeds from the fraudulent sale of stolen vehicles were deposited into a Bank of America account for Platinum Zen Motors. Security videos captured Geovany ALVAREZ, Jesus ARRIAGA, and others conducting transactions involving the Bank of America account for Platinum Zen Motors.

27. Geovany ALVAREZ is the son of Carlos A. ALVAREZ. Carlos A. ALVAREZ has been arrested for similar offenses involving stolen vehicles and VIN fraud in the State of Texas and the State of Georgia. In May 2023, Carlos ALVAREZ was arrested by the Pottawattamie County (Iowa) Sheriff's Office. Geovany ALVAREZ visited Carlos ALVAREZ while he was incarcerated at the Pottawattamie County Jail. Prior to the visit, Geovany ALVAREZ provided his Texas

identification, phone 469-755-4568, and email spoolyboy@icloud.com to the Pottawattamie County Sheriff's Office.

28. AT&T responded to a Grand Jury subpoena and provided records for 469-755-4568. The records identified the account holder, since August 13, 2020, as Geovany M. ALVAREZ of 509 Hinton St. Grand Prairie, TX 75050. The email spoolyboy@icloud.com was also associated with the account. A mobile device with IMEI 352114958455415 was associated with the 469-755-4568. An account invoice was recently paid on August 9, 2023.

29. On September 20, 2023, United States Magistrate Judge Stephen C. Dries, of the Eastern District of Wisconsin authorized an E911/GPS location warrant for the cellular device with the phone number 469-755-4568.

30. On September 20, 2023 the E911/GPS location the search warrant was executed and sent to AT&T.

31. E911/GPS location data indicated ALVAREZ's cell phone 469-755-4568 was in Bloomington, Illinois. Case agents checked Facebook Market Place listing for GMC Sierra Denali's with a year range of 2020-2022 and with a price range of \$30,000 to \$38,000. Case Agents located a listing placed by Rosa Perales (joined Facebook in 2023) for a 2020 GMC Sierra 1500 Crew Cab for \$37,500 in Bloomington, IL. The advertisement was in Spanish and consisted of twelve photographs. Photograph #6 of the advertisement depicted the truck tailgate with a reflection of the photographer, who was a male wearing a white t-shirt and a satchel bag hung across his chest. This photograph also depicted another GMC pick-up inside a warehouse with white and blue metal siding and an overhead bay door. Based on these observations having a similar Modis Operandi, this

Facebook Market Place advertisement was suspected to be related to the Geovany ALVAREZ operation.

32. Case Agents contacted the Bloomington Police Department and spoke with Crime & Intelligence Analysis Unit (“CIAU”) Supervisor Jack McQueen. He was provided the background of this investigation, including suspect information and locations. He was provided with the Facebook Market Place advertisement posted by Rosa Perales, depicting the suspected stolen truck and suspect location. CIAU Supervisor Jack McQueen later advised that he located additional Facebook Market Place posts, suspected to be linked to this investigation. He also identified the address of 917 W. Front St. Bloomington, IL as the warehouse location from the Facebook Market Place photograph and another location two blocks from this location where additional photographs were obtained of suspected stolen trucks.

33. On September 22, 2023, Case Agents were in contact with Det. Kevin Raisbeck of the Bloomington Police Department regarding this investigation. Investigators from Bloomington Police Department were conducting surveillance at 917 W. Front St. Bloomington, IL and obtained video/photograph evidence of Geovany ALVAREZ and additional suspects at this location, moving the suspected stolen pick-up trucks to and from the warehouse. Surveillance of ALVAREZ and the other suspects showed that they were likely staying at Hawthorn Inn & Suites 1 Lyon Ct. Bloomington, IL. On, September 22, 2023, the Bloomington Police Department executed a State of Illinois search warrant for the warehouse at 917/921 W. Front St. The next day, the Bloomington Police Department executed a search warrant on the two hotel rooms they learned Geovany ALVAREZ and his co-conspirators were staying (Hawthorn Inn & Suites 1 Lyon Ct. Bloomington, IL Room # 320 and # 330).

34. As a result of the search warrants eight GMC and Chevrolet trucks were recovered (with VIN #'s flipped/altered). Seven of the eight trucks were confirmed as reported stolen from Texas, and the eighth truck is pending determination due to the components being disabled. During the execution of the search warrants, the **ELECTRONIC DEVICES** were recovered in the manner described in paragraph 6. During the execution of the search warrants, case agents recovered other electronics, a firearm, suspected fraud-related documents, fictitious passports/documents, and numerous vehicle key fobs.

35. Geovany ALVAREZ, Jesus ARRIAGA, Henry L. GOMEZ-GOMEZ, Carlos G. GUZMAN-TOLEDO, and Anthony W. GOMEZ-GOMEZ were arrested as a result of the investigation in Bloomington, IL. After his arrest, ALVAREZ provided a statement indicating his involvement in this motor vehicle theft/fraud operation, including a previous incident near Milwaukee, WI. ALVAREZ also advised that all the suspects in Bloomington, IL were aware that they were selling stolen motor vehicles.

36. Based upon the above-detailed facts, there is probable cause to believe that the **ELECTRONIC DEVICES** contain evidence and instrumentalities of crimes, namely related to violations of Title 18 United States Code Sections 511(a) (altering or removing motor vehicle identification numbers); 2312 (interstate transportation of stolen vehicles); 2321 (Buying or selling motor vehicles with altered vehicle identification numbers); and 371 (conspiracy to commit those offenses). Through my training, experience, and discussions with other experienced law enforcement officers, I am familiar with the ways in which persons involved in large scale theft/fraud operations conduct their unlawful trade, including their methods of operations, their utilization of communication devices, their use of coded communications to conduct their transactions, the employment of counter

surveillance, their use of false or fictitious identities, and their utilization of various different types of electronic devices to store and/or conceal illegal activity.

37. Based upon my training and experience, I know that individuals involved in large scale theft/fraud operations use cellular telephones to maintain contact with their sources of stolen vehicles as well as customers and co-conspirators in the distribution/fraudulent sale of stolen motor vehicles. I know that individuals involved in large scale theft/fraud operations often use multiple cellular telephones to compartmentalize their illicit activity to help evade detection by law enforcement. I have also found it common for crime suspects to use their cellular telephones to communicate orally or via electronic message in “text” format with individuals whom they purchase, trade, or otherwise negotiate to obtain stolen vehicles. Therefore, there is probable cause to believe that records contained within said **ELECTRONIC DEVICES** will provide evidence related to the identity of said supplier(s), coconspirators, and customers (victims).

38. Based upon my training and experience, I believe it is common for individuals involved in large scale theft/fraud operations often take or cause to be taken photographs and other visual depictions of themselves, their associates, and the stolen vehicles that they control, possess, transport, and sell; furthermore, I believe it is common for these photographs and visual depictions to be kept and maintained on their cellular devices.

39. In this case, there is probable cause to believe that this group of individuals has conducted a similar fraud scheme in different locations throughout the United States. Accordingly, location data commonly stored on electronic devices will also constitute evidence of the above-mentioned crimes.

40. The **ELECTRONIC DEVICES** have been stored in a manner in which its contents are, to the extent material to this investigation, in substantially the same state as they were when the **ELECTRONIC DEVICES** first came into the possession of case agents.

TECHNICAL TERMS

41. Based on my training and experience, I use the following technical terms to convey the following meanings:

- a. Wireless telephone: A wireless telephone (or mobile telephone, or cellular telephone) is a handheld wireless device used for voice and data communication through radio signals. These telephones send signals through networks of transmitter/receivers, enabling communication with other wireless telephones or traditional “land line” telephones. A wireless telephone usually contains a “call log,” which records the telephone number, date, and time of calls made to and from the phone. In addition to enabling voice communications, wireless telephones offer a broad range of capabilities. These capabilities include: storing names and phone numbers in electronic “address books;” sending, receiving, and storing text messages and e-mail; taking, sending, receiving, and storing still photographs and moving video; storing and playing back audio files; storing dates, appointments, and other information on personal calendars; and accessing and downloading information from the Internet. Wireless telephones may also include global positioning system (“GPS”) technology for determining the location of the device.
- b. Digital camera: A digital camera is a camera that records pictures as digital picture files, rather than by using photographic films. Digital cameras use a variety of fixed and removable storage media to store their recorded images. Images can usually be retrieved by connecting the camera to a computer or by connecting the removable storage medium to a separate reader. Removable storage media include various types of flash memory cards or miniature hard

drives. Most digital cameras also include a screen for viewing the stored images. This storage media can contain any digital data, including data unrelated to photographs or videos.

- c. Portable media player: A portable media player (or “MP3 Player” or iPod) is a handheld digital storage device designed primarily to store and play audio, video, or photographic files. However, a portable media player can also store other digital data. Some portable media players can use removable storage media. Removable storage media include various types of flash memory cards or miniature hard drives. This removable storage media can also store any digital data. Depending on the model, a portable media player may have the ability to store very large amounts of electronic data and may offer additional features such as a calendar, contact list, clock, or games.
- d. GPS: A GPS navigation device uses the Global Positioning System to display its current location. It often contains records the locations where it has been. Some GPS navigation devices can give a user driving or walking directions to another location. These devices can contain records of the addresses or locations involved in such navigation. The Global Positioning System (generally abbreviated “GPS”) consists of 24 NAVSTAR satellites orbiting the Earth. Each satellite contains an extremely accurate clock. Each satellite repeatedly transmits by radio a mathematical representation of the current time, combined with a special sequence of numbers. These signals are sent by radio, using specifications that are publicly available. A GPS antenna on Earth can receive those signals. When a GPS antenna receives signals from at least four satellites, a computer connected to that antenna can mathematically calculate the antenna’s latitude, longitude, and sometimes altitude with a high level of precision.
- e. PDA: A personal digital assistant, or PDA, is a handheld electronic device used for storing data (such as names, addresses, appointments or notes) and utilizing

computer programs. Some PDAs also function as wireless communication devices and are used to access the Internet and send and receive e-mail. PDAs usually include a memory card or other removable storage media for storing data and a keyboard and/or touch screen for entering data. Removable storage media include various types of flash memory cards or miniature hard drives. This removable storage media can store any digital data. Most PDAs run computer software, giving them many of the same capabilities as personal computers. For example, PDA users can work with word-processing documents, spreadsheets, and presentations. PDAs may also include global positioning system (“GPS”) technology for determining the location of the device.

- f. Tablet: A tablet is a mobile computer, typically larger than a phone yet smaller than a notebook that is primarily operated by touching the screen. Tablets function as wireless communication devices and can be used to access the Internet through cellular networks, 802.11 “wi-fi” networks, or otherwise. Tablets typically contain programs called apps, which, like programs on a personal computer, perform different functions and save data associated with those functions. Apps can, for example, permit accessing the Web, sending and receiving e-mail, and participating in Internet social networks.
- g. IP Address: An Internet Protocol address (or simply “IP address”) is a unique numeric address used by computers on the Internet. An IP address is a series of four numbers, each in the range 0-255, separated by periods (e.g., 121.56.97.178). Every computer attached to the Internet computer must be assigned an IP address so that Internet traffic sent from and directed to that computer may be directed properly from its source to its destination. Most Internet service providers control a range of IP addresses. Some computers have static—that is, long-term—IP addresses, while other computers have dynamic—that is, frequently changed—IP addresses.

- h. Internet: The Internet is a global network of computers and other electronic devices that communicate with each other. Due to the structure of the Internet, connections between devices on the Internet often cross state and international borders, even when the devices communicating with each other are in the same state.

42. Based on training, experience, and research, I know that Device J (the Apple Watch) has capabilities that allow it to serve as a wireless telephone, portable media player, GPS navigation device, and PDA. I know that Device P (the Apple iPad) is a tablet. I know that the other the **ELECTRONIC DEVICES** have capabilities that allow them to serve as wireless telephones, digital cameras, portable media players, GPS navigation devices, and PDAs. In my training and experience, examining data stored on devices of this type can uncover, among other things, evidence that reveals or suggests who possessed or used the device.

ELECTRONIC STORAGE AND FORENSIC ANALYSIS

43. Based on knowledge, training, and experience, I know that electronic devices can store information for long periods of time. Similarly, things that have been viewed via the Internet are typically stored for some period of time on the device. This information can sometimes be recovered with forensics tools.

44. There is probable cause to believe that things that were once stored on the **ELECTRONIC DEVICES** may still be stored there, for at least the following reasons:

- a. Based on knowledge, training, and experience, I know that computer files or remnants of such files can be recovered months or even years after they have been downloaded onto a storage medium, deleted, or viewed via the Internet. Electronic files downloaded to a storage medium can be stored for years at little

or no cost. Even when files have been deleted, they can be recovered months or years later using forensic tools. This is so because when a person “deletes” a file on a computer, the data contained in the file does not actually disappear; rather, that data remains on the storage medium until it is overwritten by new data.

- b. Therefore, deleted files, or remnants of deleted files, may reside in free space or slack space—that is, in space on the storage medium that is not currently being used by an active file—for long periods of time before they are overwritten. In addition, a computer’s operating system may also keep a record of deleted data in a “swap” or “recovery” file.
- c. Wholly apart from user-generated files, computer storage media—in particular, computers’ internal hard drives—contain electronic evidence of how a computer has been used, what it has been used for, and who has used it. To give a few examples, this forensic evidence can take the form of operating system configurations, artifacts from operating system or application operation, file system data structures, and virtual memory “swap” or paging files. Computer users typically do not erase or delete this evidence, because special software is typically required for that task. However, it is technically possible to delete this information.
- d. Similarly, files that have been viewed via the Internet are sometimes automatically downloaded into a temporary Internet directory or “cache.”

45. *Forensic evidence.* As further described in Attachment B, this application seeks permission to locate not only electronically stored information that might serve as direct evidence of the crimes described on the warrant, but also forensic evidence that establishes how the **ELECTRONIC DEVICES** were used, the purpose their use, who used them, and when. There is

probable cause to believe that this forensic electronic evidence might be on the **ELECTRONIC DEVICES** because:

- a. Data on the storage medium can provide evidence of a file that was once on the storage medium but has since been deleted or edited, or of a deleted portion of a file (such as a paragraph that has been deleted from a word processing file).
- b. Forensic evidence on a device can also indicate who has used or controlled the device. This “user attribution” evidence is analogous to the search for “indicia of occupancy” while executing a search warrant at a residence.
- c. A person with appropriate familiarity with how an electronic device works may, after examining this forensic evidence in its proper context, be able to draw conclusions about how the **ELECTRONIC DEVICES** were used, the purpose of their use, who used them, and when.
- d. The process of identifying the exact electronically stored information on a storage medium that are necessary to draw an accurate conclusion is a dynamic process. Electronic evidence is not always data that can be merely reviewed by a review team and passed along to investigators. Whether data stored on a computer is evidence may depend on other information stored on the computer and the application of knowledge about how a computer behaves. Therefore, contextual information necessary to understand other evidence also falls within the scope of the warrant.
- e. Further, in finding evidence of how a device was used, the purpose of its use, who used it, and when, sometimes it is necessary to establish that a particular thing is not present on a storage medium.

46. *Nature of examination.* Based on the foregoing, and consistent with Rule 41(e)(2)(B), the warrant your affiant is applying for would permit the examination of the **ELECTRONIC DEVICES** consistent with the warrant. The examination may require authorities to employ techniques, including but not limited to computer-assisted scans of the entire medium, that might expose many parts of the device to human inspection in order to determine whether it is evidence described by the warrant.

47. *Manner of execution.* Because this warrant seeks only permission to examine a device already in law enforcement's possession, the execution of this warrant does not involve the physical intrusion onto a premises. Consequently, I submit there is reasonable cause for the Court to authorize execution of the warrant at any time in the day or night.

CONCLUSION

48. I submit that this affidavit supports probable cause for a search warrant authorizing the examination of the **ELECTRONIC DEVICES** described in Attachment A to seek the items described in Attachment B.

ATTACHMENT A

The property to be searched is described as follows:

- a)** Black Motorola Android touch screen cell phone with no case. (“Device A”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-1).
- b)** Gold Apple iPhone touch screen cell phone with cracked screen and Joe Biden sticker (I did that) on back. (“Device B”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-2). Geovany ALVAREZ possessed Devices A and B when he was arrested at 1 Lyon Ct. Bloomington, IL.
- c)** Gold Apple iPhone touch screen cell phone with clear and gold case. (“Device C”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-3). Henry GOMEZ-GOMEZ possessed Device C when he was arrested at 1 Lyon Ct. Bloomington, IL.
- d)** Gold and silver Apple iPhone touch screen cell phone. (“Device D”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-4).
- e)** Black Nokia Android touch screen cell phone with no case. (“Device E”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-5).
- f)** Black Samsung Android touch screen cell phone with no case. (“Device F”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-6).
- g)** Black Motorola Android touch screen cell phone with no case. (“Device G”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD

Inventory # 23-004615-7). Carlos GUZMAN-TOLEDO possessed Devices D, E, F, and G when he was arrested at 1 Lyon Ct. Bloomington, IL.

- h)** Black Samsung Android touch screen cell phone with blue case. (“Device H”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-8).
- i)** Purple Apple iPhone touch screen cell phone with black case. (“Device I”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-9).
- j)** Grey Apple watch touch screen with silver band. (“Device J”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-10). Anthony GOMEZ-GOMEZ possessed Devices H, I, and J when he was arrested at 1 Lyon Ct. Bloomington, IL.
- k)** Black Samsung Android touch screen with no case. (“Device K”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-11).
- l)** Gold Apple iPhone touch screen cell phone with no case. (“Device L”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-12).
- m)** Grey Nokia Android touch screen cell phone with green/black case. (“Device M”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-13). Investigators located Devices K, L, and M during the execution of State of Illinois search warrant at 1 Lyon Ct. Bloomington, IL Room # 330 inside a designer Coach Bag.
- n)** Black Samsung fold touch screen cell phone with no case. (“Device N”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-14).

- o)** Black Apple iPhone touch screen with cracked back and no case. (“Device O”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-15).
- p)** Apple iPad with black case. (“Device P”) Currently located at 11301 W. Lincoln Ave. West Allis, WI 53227 (WAPD Inventory # 23-004615-16). Investigators located Devices N, O, and P during the execution of State of Illinois search warrant at 1 Lyon Ct. Bloomington, IL, Room # 330.

(collectively “**ELECTRONIC DEVICES**”). This warrant authorizes the forensic examination of the **ELECTRONIC DEVICES** for the purpose of identifying the electronically stored information described in Attachment B.

ATTACHMENT B

1. All records on the **ELECTRONIC DEVICES** described in Attachment A that constitute evidence or instrumentalities of violations of Title 18, United States Code, Sections 511(a) (altering or removing motor vehicle identification numbers); 2312 (interstate transportation of stolen vehicles); 2321 (Buying or selling motor vehicles with altered vehicle identification numbers); and 371 (conspiracy to commit those offenses) since January 1, 2022 through September 23, 2023 including, but not limited to:

- a. Records related to the sale of stolen vehicles including advertisements and communications with customers;
- b. Records reflecting communication between co-conspirators including communications relating to the logistics of the conspiracy;
- c. Records reflecting communication about the procurement of stolen vehicles to sell;
- d. Contact lists;
- e. Any information regarding schedules or travel;
- f. All bank records including, but not limited to, checks, credit card bills, account information, and other financial records;
- g. Photographs and/or videos depicting theft/fraud, money laundering, or other related activity, including co-conspirators and/or others engaged in such activity; and
- h. Records of Internet Protocol (IP) addresses used; records of internet activity, including firewall logs, caches, browser history and cookies,

“bookmarked” or “favorite” web pages, search terms that the user entered into any internet search engine, and records of user typed web addresses;

2. Evidence of user attribution showing who used or owned the electronic devices described in Attachment A at the time the things described in this warrant were created, edited, or deleted, such as logs, phonebooks, saved usernames and passwords, documents, and browsing history;

As used above, the terms “records” and “information” include all of the foregoing items of evidence in whatever form and by whatever means they may have been created or stored, including any form of computer or electronic storage (such as flash memory or other media that can store data) and any photographic form.